

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Irene Keller,) **Case No.: 2:24-cv-05884-DCN**
)
)
 Plaintiffs,)
)
)
 v.)
) **DEFENDANTS' EXPERT DISCLOSURES**
 Howard Anthony James and Penske)
 Truck Leasing Co.,)
)
)
 Defendants.)

Pursuant to Fed. R. Civ. P. 26(a)(2)(A), Defendants Howard Anthony James and Penske Truck Leasing Co. disclose the following the experts:

Marc Paradiso, M.S., P.E.

Exponent Accident Reconstruction and Analysis
3350 Peachtree Road NE, Suite #1125
Atlanta, GA 30326
(678) 412-4832
MParadiso@Exponent.com

Marc Paradiso is a Licensed Professional Engineer who specializes in accident reconstruction, vehicle crash analysis, and ADAS system analysis. Paradiso is expected to offer opinions within a reasonable degree of scientific and engineering certainty on the force and post-impact accelerations resulting from the subject incident.

Chimba Mkandawire, Ph.D., P.E., CAISS

Exponent Accident Reconstruction and Analysis
3350 Peachtree Road NE, Suite #1125
Atlanta, GA 30326
(678) 412-4812
CMkandawire@Exponent.com

Chimba Mkandawire is a Biomechanical Engineer who specializes in analysis issues involving the biomechanics of human injury. Mkandawire is expected to offer opinions within a reasonable degree of scientific, engineering, and

biomechanical certainty on the causal biomechanical relationship between the subject incident and the documented injuries.

Michael W. Peelle, MD

Orthopedic and Neurologic Surgery of the Spine

IMS Legal Strategies

5050 Quorum Drive, Suite 700

Dallas, TX 75254

Dr. Peelle is a Board Certified Orthopedic Surgeon. See his produced CV for additional credentials. He is expected to testify regarding his review of the alleged medical injuries and their causal relationship from the accident as well as appropriate treatment for same.

Defendants reserve the right to supplement these disclosed experts with those allowed pursuant to any agreement of the parties and/or leave of the Court.

A report from these experts with the contents required by FED. R. CIV. P. 26(a)(2)(B) will be provided in accordance with the current and/or any additional scheduling orders and agreements of the Parties to Plaintiff, through their counsel.

Depending on representatives or individuals Plaintiff seeks to illicit testimony from or about Defendant and Defendant's business operations, Defendants reserve the right to supplement and identify additional witnesses who may have specialized knowledge, skill, or training in the commercial motor carrier industry.

Defendants reserve the right to elicit expert testimony from individuals named as experts by other parties to this case. Defendants further reserve the right to supplement this disclosure at a later time should the case develop in such a way to warrant additional expert testimony on Defendant's behalf either by consent of the parties or with leave from this Court.

(Signature Page to Follow)

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/Marshall C. Crane

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September 19, 2025